

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**JULIO CESAR CABALLERO BARRAZA,
and SARAHI RIVERA FLORES**

Plaintiffs,

v.

No. 1:13-cv-01007 JAP-SMV

**NEW MEXICO DEPARTMENT OF PUBLIC SAFETY;
GORDEN E. EDEN, Secretary of Department of
Public Safety in his Individual and official capacities;
NEW MEXICO STATE POLICE; CHIEF Chris Kassetas
in his individual and official capacities; Deputy Chief DAVID
MARTINEZ of the Investigations Bureau in his individual and official capacities;
CAPTAIN JUAN MARTINEZ in charge of the North Zone Investigations Bureau in his
individual and official capacities; and
SERGEANT CHRIS VALDEZ in his individual and official
capacities; AGENT LORENZO AGUIRRE in his individual and
official capacities; AGENT JOEY GALLEGOS in his individual
and official capacities; and OFFICER MICHAEL DIAS in his
individual and official capacities,**

Defendants.

JOINT MOTION TO DISMISS

COME NOW Plaintiffs, Julio Cesar Caballero Barraza and Sarahi Rivera Flores, and Defendant, the New Mexico Department of Public Safety, including its component, the New Mexico State Police Department, by and through their attorneys of record, and pursuant to Fed. R.Civ.P. 41, hereby jointly move this Court for its Order to Dismiss Plaintiffs' claims against the Defendant with prejudice.

WHEREFORE, the parties respectfully request that the Court enter its Order dismissing Plaintiffs' claims against the Defendant, the New Mexico Department of Public Safety, including its component, the New Mexico State Police Department with prejudice, with each party to bear their own costs and attorney fees. A Stipulated Order of Dismissal accompanies this motion.

Respectfully submitted,

Noble & Vrapì, P.A.

/s/ Electronically filed on 9/17/14

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Approved on September 15, 2014 via email

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Captain Juan Martinez*

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